

Friday, 27 November 2015

NSW Natural Resources Commission
GPO Box 5341,
Sydney NSW 2001
Email: nrc@nrc.nsw.gov.au



To Whom It May Concern,

**Ref: State-wide review of pest animal management.
Control of non-native Carp species in NSW waterways with release of KHV**

Dear Sir / Madam

The Pet Industry Association of Australia (PIAA) is the peak body that represents the pet industry in Australia. This includes all sections of the home aquarium industry such as fish importers, local breeders, wholesalers and retail stores as well as the manufacturers and importers of tanks, accessories and food.

The pet industry in Australia contributes around \$8 billion to the Australian economy and is estimated to save the economy \$2.2 billion in health benefits. This is because there is a substantial amount of research demonstrating that people with pets are healthier and less likely to visit doctors and require medication. Given that 60% of all the pets kept in Australia are home aquarium fish, the aquarium industry contributes significantly to our society. The de-stressing effect of watching an aquarium has been understood for many years, hence its common place in doctors and dentist reception areas.

We wish to express our concern at the proposed release of Koi Herpesvirus (KHV) into New South Wales (NSW) waterways for the control of feral carp (*Cyprinus carpio carpio*). KHV is an aquatic disease of concern and is listed by the OIE (Office International des Epizooties), which is the World Organization for Animal Health.

See: <http://www.oie.int/animal-health-in-the-world/oie-listed-diseases-2015/>

It is of great concern that such a serious disease would even be considered for release in Australia. The Koi industry of Australia operates in both NSW and Western Australia (WA) where thousands of hobbyists often spend huge amounts of money building elaborate ponds to enjoy their koi keeping.

When the Rabbit Calicivirus was released in Australia (in the mid-1990's) there was a vaccine available so that veterinarians could vaccinate pet rabbits against the virus. No such vaccine currently is available for Koi carp (*Cyprinus carpio koi*) and the effect in overseas countries where KHV has occurred have been devastating on koi owners. The welfare of Koi, which are in reality pet fish, must be considered.

There is even anecdotal evidence from overseas that the effects are far more severe in Koi than in the feral carp, which are the target.



The PIAA is also very concerned that the release of this virus into waterways is likely to cause the death of massive numbers of feral carp within days to weeks, resulting in an enormous detrimental effect on the environment. The low oxygen levels that will result from the decaying fish, which will then also kill many native fish. Has this issue been considered as it will be a major environmental disaster. There will be no way of controlling this once the virus is released.

The PIAA completely acknowledges the severe impact of feral carp on our waterways and native fish, but does not believe that the release of KHV is the best option. A genetic program of control is well underway from a research viewpoint. This would be a far safer option than the release of KHV. Whilst this alternative program may take longer, there will not be the risk to the Koi industry as well as the major environmental impact of many feral carp dying as outlined above.

For details of the genetic program, please see:

<http://www.invasiveanimals.com/research/phase1/goals/goal-4/4f3/>

The PIAA urges the NSW Natural Resources Commission to re-consider the release of KHV into their waterways and look more closely at the genetic modification solution.

Yours Faithfully



Dr. Rob Jones “The Aquarium Vet”

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